

STEVEN M. CAMPORA, SBN 110909
DREYER BABICH BUCCOLA
WOOD CAMPORA, LLP

20 Bicentennial Circle
Sacramento, CA 95826

Telephone: (916) 379-3500
Facsimile: (916) 379-3599

Attorneys for Creditors, Monica Huchro and Monica Huchro as Trustee of the Monica Huchro Revocable Trust.

ESTELA O. PINO, SBN 112975
PINO & ASSOCIATES

1520 Eureka Rd., Suite 101,
Roseville, CA 95661

Telephone: (916) 641-2288
Facsimile: (916) 954-0122

Attorneys for Dreyer Babich Buccola Wood Campora, LLP

THE UNITED STATES BANKRUPTCY COURT
IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:) Case Nos. 19-30088 (DM)

PG&E CORPORATION,) Chapter 11

-and-

In re:) **DECLARATION OF STEVE CAMPORA**
) **IN SUPPORT OF MOTION FOR ORDER**
) **AUTHORIZING WITHDRAWAL OF**
) **COUNSEL TO MONICA HUCHRO AND**
) **MONICA HUCHRO AS TRUSTEE OF**
) **THE MONICA HUCHRO REVOCABLE**
) **TRUST**

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

DATE: August 13, 2024
TIME: 10:00 A.M.
PLACE: **Telephone/Videoconference**
<https://www.canb.uscourts.gov/calendars>

JUDGE: Hon. Dennis Montali

** All papers shall be filed in the lead case, No. 19-30088(DM)*

OBJECTION DEADLINE: **July 30, 2024**
(4:00 P.M. Prevailing Pacific Time)

1 I, Steve Campora, hereby declare as follows in support of the Motion for Order Authorizing
2 Withdrawal of Counsel to Monica Huchro and Monica Huchro as Trustee of the Monica Huchro
3 Revocable Trust (the "Motion"):
4

5 1. The facts set forth herein are true and within the scope of my personal knowledge,
6 and if called upon to do so I could and would testify competently to these facts.
7

8 2. I am an attorney duly admitted to practice in the State of California. I am a partner at
9 Dreyer Babich Buccola Wood Campora, LLP ("Dreyer Babich"), who is the attorney of record for:
10 Monica Huchro and Monica Huchro as Trustee of the Monica Huchro Revocable Trust (collectively
11 the "Creditors").
12

13 3. I am authorized on behalf of Dreyer Babich to make these representations in support
14 of the Motion.
15

16 4. On January 29, 2019, PG&E Corporation and Pacific Gas & Electric Company filed
17 petitions for relief under Chapter 11 of Title 11 of the United States Code with the United States
18 Bankruptcy Court, in and for the Northern District of California, (the "Court") commencing case
19 numbers 2019-30088 (DM) and 2019-30089 (DM) (collectively the "Bankruptcy Cases").
20

21 5. On October 2, 2019, Dreyer Babich timely filed two (2) separate Proofs of Claim in
22 the Bankruptcy Cases on behalf of the Creditors, which were assigned claim numbers 34845 and
23 34923 (collectively the "Proofs of Claim"), seeking damages on behalf of Creditors from the Camp
24 Fire.
25

26 6. Since the filing of the Proofs of Claim, irreconcilable differences have developed
27 between Creditors and Dreyer Babich to such an extent that the attorney-client relationship has
28 broken down and is no longer sustainable.

1 7. The irreconcilable differences make it impossible for Dreyer Babich and I to continue
2 to represent the Creditors.

3
4 8 To the extent that Creditors request that Dreyer Babich turn over any files or
5 information to which they are entitled, Dreyer Babich will cooperate and transmit such files.

6
7 9. Upon granting of the Motion, Dreyer Babich will provide notice to the Trustee of the
8 Fire Victim Trust (the "Trustee") established for the claims arising out of the Camp Fire, so that the
9 Creditors may be given access to their entire file with the Trustee.

10 10. Dreyer Babich will cause the Motion, my declaration, and the Notice regarding the
11 Motion to be served on all the addresses provided to it by Creditors, as follows:

12
13
14 **Monica Huchro**
15 6224 Harvey Road
16 Paradise, CA 95969

17 **Monica Huchro as Trustee of the**
18 **Monica Huchro Revocable Trust**
19 6224 Harvey Road
20 Paradise, CA 95969

21 I declare under penalty of perjury under the laws of the United States of America that the
22 foregoing is true and correct.

23 Executed this 16th day of July, 2024, at Sacramento, Sacramento County, California.

24
25
26
27
28


Steve Campora